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14 UNITED STATES DISTRICT COURT
15 DISTRICT OF NEVADA

16 ALLSTATE INSURANCE COMPANY,
ALLSTATE PROPERTY & CASUALTY
17 INSURANCE COMPANY, ALLSTATE
INDEMNITY COMPANY, and ALLSTATE
18 FIRE & CASUALTY INSURANCE
COMPANY,

19 Plaintiffs,

20 v.

21 MARJORIE BELSKY, MD; MARIO
22 TARQUINO, MD; MARJORIE BELSKY,
MD, INC., doing business as INTEGRATED
23 PAIN SPECIALISTS; and MARIO
TARQUINO, MD, INC., DOES 1-100, and
24 ROES 101-200,

25 Defendants.

26 AND RELATED CLAIMS
27
28

CASE NO. 2:15-cv-2265-MMD-CWH

**STIPULATION TO INCLUDE LAW
OFFICE OF JESS R. MARCHESE INTO
THE STIPULATED CONFIDENTIALITY
AND PROTECTIVE ORDER (ECF NO.
49) FOR THE DISCLOSURE OF
DOCUMENTS PURSUANT TO F.R.C.P.
45 SUBPOENA**

2:15-cv-2265-MMD-CWH

1 Plaintiffs/Counter-defendants ALLSTATE INSURANCE COMPANY, ALLSTATE
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,
3 and ALLSTATE FIRE & CASUALTY COMPANY (collectively referred to as the "Plaintiffs"), and
4 the LAW OFFICE OF JESS R. MARCHESE (non-party herein after referred to as "MARCHESE")
5 hereby stipulate and agree as follows:

6 1. Plaintiffs served MARCHESE with a subpoena pursuant to F.R.C.P. 45 for the
7 production of documents regarding communications and payments made by and between Law Firm
8 and the Defendants during MARCHESE's representation of certain clients in personal injury claims
9 for which Plaintiffs paid on settlement on behalf of Plaintiffs' insureds.

10 2. MARCHESE is aware that Plaintiffs have subpoenaed several law firms seeking the
11 same type of information pursuant to Rule 45 in this case, as well as a companion sister-lawsuit
12 *Allstate v. Shah, et. al. Case No. 2:15-cv-01786-APG-CWH* ("Shah").

13 4. MARCHESE understands that this Court presides over both the instant matter as well
14 as the *Shah* matter, and that this Court has ruled consistently in both these cases and ordered other law
15 firms to produce the same type of documents request of MARCHESE.

16 5. A stipulated confidentiality and protective order in this case entered between Plaintiffs
17 and Defendants for the disclosure of confidential, sensitive or other protected information was
18 approved by this Court on June 3, 2016. (ECF No. 49).

19 6. MARCHESE was not a party to the stipulated confidentiality and protective order.
20 (ECF No. 49).

21 7. In ordering compliance with Plaintiffs' subpoenas to other law firms, this Court also
22 ordered that the confidentiality and protective order (ECF No. 49) be applied to those law firms.

23 8. In accordance with this Court's prior rulings both in this action and in the *Shah* matter,
24 the parties hereby stipulate and agree that the protections and scope articulated in the Stipulated
25 Confidentiality and Protective Order approved by this Court on June 3, 2016. (ECF No. 49) be
26 extended in their entirety to cover MARCHESE in its compliance with Plaintiffs' subpoena.

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1 9. MARCHESE will produce all documents responsive to the subpoena within ten (10)
2 days of approval and entry of this Order by the Court.

3 IT IS SO STIPULATED.

4 Dated: 1/2/19

Dated: 12-28-18

5 McCORMICK, BARSTOW, SHEPPARD,
6 WAYTE & CARRUTH LLP

LAW OFFICE OF JESS R. MARCHESE

7 By: 

By: 

8 DYLAN P. TODD, ESQ.

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10 Attorneys for Plaintiffs/Counterdefendants

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702-385-5377

15 **ORDER**

16 IT IS SO ORDERED.

17 DATED this 11 day of January, 2019
~~December, 2018.~~

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20 UNITED STATES MAGISTRATE JUDGE

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